MINOR SOURCE OPERATING PERMIT
OFFICE OF AIR MANAGEMENT

Steve Reiff, Inc.
5650 W. 800 S.
South Whitley, IN 46787

(herein known as the Permittee) is hereby authorized to construct and operate subject to the conditions contained herein, the emission units described in Section A (Source Summary) of this permit.

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-5.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

Operation Permit No.: MSOP 183-11150-00031	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-5.1-3(c)] [326 IAC 2-6.1-4(a)]

The Permittee owns and operates a surface coating operation for primary grain carts and finishing front loading cement mixers.

Authorized Individual:	Stan Reiff
Source Address:	5650 W. 800 S. South Whitley, IN 46787
Mailing Address:	P.O. Box 531, South Whitley, IN 46787
Phone Number:	219-723-4360
SIC Code:	7532
County Location:	Whitley
County Status:	Attainment for all criteria pollutants
Source Status:	Minor Source Operating Permit Minor Source, under PSD Rules; Minor Source, Section 112 of the Clean Air Act

A.2 Emissions units and Pollution Control Equipment Summary

This stationary source is approved to construct and operate the following emissions units and pollution control devices:

(a) Four (4) grain cart surface coating booths, identified as 1-1, 1-2, 1-3, 1-4, each with a maximum capacity of 0.5 grain carts per hour, using dry filters as particulate control, and exhausting to stacks PB1-1, PB1-2, PB1-3, PB1-4, respectively,

(b) One (1) cement mixer coating booth, identified as 1-5, with a maximum capacity of 0.056 cement mixers per hour, using dry filters as particulate control, and exhausting to stack PB1-5,

(c) Four (4) front discharge mixer truck surface coating booths, identified as 3-1, 3-2, 3-3, 3-4, each with a maximum capacity of 0.056 grain carts per hour, using dry filters as particulate control, and exhausting to stacks PR-3-1, PR-3-2, PR-3-3, PR-3-4, respectively,

(d) Three (3) sand blasters, identified as BB-1 and SB-1-2, with a maximum capacity of 1,119 pounds of abrasive per hour, exhausting inside the building, and

(e) Nine (9) radiant space heaters, each rated at 0.975 million British thermal units (MMBtu) per hour, exhausting to the interior of the building.

SECTION B GENERAL CONSTRUCTION CONDITIONS

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1.1 AND 40 CFR 52.780, WITH CONDITIONS LISTED BELOW.

B.1 Permit No Defense [IC 13]

This permit to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

B.2 Definitions

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, any applicable definitions found in IC 13-11, 326 IAC 1-2, and 326 IAC 2-1.1-1 shall prevail.

B.3 Effective Date of the Permit [IC13-15-5-3]

Pursuant to IC 13-15-5-3, this permit becomes effective upon its issuance.

B.4 Revocation of Permits [326 IAC 2-1.1-9(5)]

Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the Commissioner may revoke this permit if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

B.5 Modification to Permit [326 IAC 2]

Notwithstanding the Section B condition entitled “Minor Source Operating Permit”, all requirements and conditions of this construction permit shall remain in effect unless modified in a manner consistent with procedures established for modifications of construction permits pursuant to 326 IAC 2 (Permit Review Rules).

B.6 Minor Source Operating Permit [326 IAC 2-6.1]

This document shall also become a minor source operating permit pursuant to 326 IAC 2-6.1 when, prior to start of operation, the following requirements are met:

(a) The attached Affidavit of Construction shall be submitted to the Office of Air Management (OAM), Permit Administration & Development Section.

(1) If the Affidavit of Construction verifies that the facilities covered in this Construction Permit were constructed as proposed in the application, then the facilities may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM.

(2) If the Affidavit of Construction does not verify that the facilities covered in this Construction Permit were constructed as proposed in the application, then the Permittee shall receive an Operation Permit Validation Letter from the Chief of the Permit Administration & Development Section prior to beginning operation of the facilities.

(b) If construction is completed in phases; i.e., the entire construction is not done continuously, a separate affidavit must be submitted for each phase of construction. Any permit conditions associated with operation start up dates such as stack testing for New Source Performance Standards (NSPS) shall be applicable to each individual phase.

(c) Upon receipt of the Operation Permit Validation Letter from the Chief of the Permit Administration & Development Section, the Permittee shall attach it to this document.

(d) The operation permit will be subject to annual operating permit fees pursuant to 326 IAC 2-1.1-7(Fees).

(e) Pursuant to 326 IAC 2-6.1-7, the Permittee shall apply for an operation permit renewal at least ninety (90) days prior to the expiration date established in the validation letter. If IDEM, OAM, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied. The operation permit issued shall contain as a minimum the conditions in Section C and Section D of this permit.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

C.1 PSD Minor Source Status [326 IAC 2-2] [40 CFR 52.21]

(a) The total source potential to emit of all criteria pollutants is less than 250 tons per year. Therefore the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 will not apply.

C.2 Preventive Maintenance Plan [326 IAC 1-6-3]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) after issuance of this permit, including the following information on each emissions unit:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

(b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that failure to implement the Preventive Maintenance Plan does not cause or contribute to a violation of any limitation on emissions or potential to emit.

(c) PMP's shall be submitted to IDEM, OAM upon request and shall be subject to review and approval by IDEM, OAM. IDEM, OAM, may require the Permittee to revise its Preventive Maintenance Plan whenever lack of proper maintenance causes or contributes to any violation.

C.3 Permit Revision [326 IAC 2-5.1-3(e)(3)] [326 IAC 2-6.1-6]

(a) The Permittee must comply with the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1.

(c) The Permittee shall notify the OAM within thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

C.4 Inspection and Entry [326 IAC 2-7-6(2)]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAM, U.S. EPA, or an authorized representative to perform the following:

(a) Enter upon the Permittee's premises where a permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) Have access to and copy, at reasonable times, any records that must be kept under this title or the conditions of this permit or any operating permit revisions;

(c) Inspect, at reasonable times, any processes, emissions units (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit or any operating permit revisions;

(d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

C.5 Transfer of Ownership or Operation [326 IAC 2-6.1-6(d)(3)]

Pursuant to [326 IAC 2-6.1-6(d)(3)] :

(a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAM, Permits Branch within thirty (30) days of the change.

(b) The written notification shall be sufficient to transfer the permit to the new owner by an notice-only change pursuant to 326 IAC 2-6.1-6(d)(3).

(c) IDEM, OAM, shall issue a revised permit.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

C.6 Permit Revocation [326 IAC 2-1-9]

Pursuant to 326 IAC 2-1-9(a)(Revocation of Permits), this permit to construct and operate may be revoked for any of the following causes:

(a) Violation of any conditions of this permit.

(b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.

(c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.

(d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.

(e) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of this article.

C.7 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor in a six (6) hour period.

C.8 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

Testing Requirements

C.9 Performance Testing [326 IAC 3-6][326 IAC 2-1.1-11]

(a) Compliance testing on new emissions units shall be conducted within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up, if specified in Section D of this approval. All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAM.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

(b) All test reports must be received by IDEM, OAM within forty-five (45) days after the completion of the testing. An extension may be granted by the IDEM, OAM, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

Compliance Monitoring Requirements

C.10 Compliance Monitoring [326 IAC 2-1.1-11]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. All monitoring and record keeping requirements not already legally required shall be implemented when operation begins.

C.11 Monitoring Methods [326 IAC 3]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

Record Keeping and Reporting Requirements

C.12 Malfunctions Report [326 IAC 1-6-2]

Pursuant to 326 IAC 1-6-2 (Records; Notice of Malfunction):

(a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM) or appointed representative upon request.

(b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAM, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.

(c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).

(d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

C.13 Monitoring Data Availability [326 IAC 2-6.1-2] [IC 13-14-1-13]

(a) With the exception of performance tests conducted in accordance with Section C-Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.

(b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.

(c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.

(d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.

(e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.

(f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.14 General Record Keeping Requirements [326 IAC 2-6.1-2]

(a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAM, representative. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) Records of required monitoring information shall include, where applicable:

(1) The date, place, and time of sampling or measurements;

(2) The dates analyses were performed;

(3) The company or entity performing the analyses;

(4) The analytic techniques or methods used;

(5) The results of such analyses; and

(6) The operating conditions existing at the time of sampling or measurement.

(c) Support information shall include, where applicable:

(1) Copies of all reports required by this permit;

(2) All original strip chart recordings for continuous monitoring instrumentation;

(3) All calibration and maintenance records;

(4) Records of preventive maintenance shall be sufficient to demonstrate that failure to implement the Preventive Maintenance Plan did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.

(d) All record keeping requirements not already legally required shall be implemented when operation begins.

C.15 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

(a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Semi-Annual Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported. The Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

(d) Unless otherwise specified in this permit, any Semi-Annual report shall be submitted within thirty (30) days of the end of the reporting period. The report does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(e) All instances of deviations must be clearly identified in such reports. A reportable deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:

(1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or

(2) A malfunction as described in 326 IAC 1-6-2; or

(3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.

(4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred or failure to monitor or record the required compliance monitoring is a deviation.

(f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.

(g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

C.16 Annual Notification [326 IAC 2-6.1-5(a)(5)]

(a) Annual notification shall be submitted to the Office of Air Management stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.

(b) Noncompliance with any condition must be specifically identified. If there are any permit conditions or requirements for which the source is not in compliance at any time during the year, the Permittee must provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be, achieved. The notification must be signed by an authorized individual.

(c) The annual notice shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in the format attached no later than March 1 of each year to:

Compliance Data Section, Office of Air Management
Indiana Department of Environmental Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, IN 46206-6015

(d) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description

(a) Four (4) grain cart surface coating booths, identified as 1-1, 1-2, 1-3, 1-4, each with a maximum capacity of 0.5 grain carts per hour, using dry filters as particulate control, and exhausting to stacks PB1-1, PB1-2, PB1-3, PB1-4, respectively,

(b) One (1) cement mixer coating booth, identified as 1-5, with a maximum capacity of 0.056 cement mixers per hour, using dry filters as particulate control, and exhausting to stack PB1-5,

(c) Four (4) front discharge mixer truck surface coating booths, identified as 3-1, 3-2, 3-3, 3-4, each with a maximum capacity of 0.056 grain carts per hour, using dry filters as particulate control, and exhausting to stacks PR-3-1, PR-3-2, PR-3-3, PR-3-4, respectively,

(d) Three (3) sand blasters, identified as BB-1 and SB-1-2, with a maximum capacity of 1,119 pounds of abrasive per hour, exhausting inside the building, and

(e) Nine (9) radiant space heaters, each rated at 0.975 million British thermal units (MMBtu) per hour, exhausting to the interior of the building.

(The information describing the process contained in this emissions unit description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volume-weighted average volatile organic compound (VOC) content of coating delivered to the applicator at the spray booths (ID's 1-1,1-2, 1-3, 1-4, 1-5, 3-1, 3-2, 3-3, and 3-4) shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for forced warm air dried coatings. The volume-weighted average VOC content shall be determined by use of the equation:

$$\text{Volume-Weighted Average} = \frac{\sum(\text{individual coating usage (gal/hr)} * Ec)}{\sum(\text{coating usage (gal/hr)})}$$

where: Ec = pounds of VOC per gallon of coating less water for each coating

Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

D.1.2 Particulate Matter (PM) [326 IAC 6-3-2(c)]

(a) The particulate matter (PM) from the spray booths (ID's 1-1,1-2, 1-3, 1-4, 1-5, 3-1, 3-2, 3-3, and 3-4) shall be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour and P = process weight rate in tons per hour

(b) The particulate matter emissions from the three (3) sand blasters, (ID BB-1 and SB-1-2) shall be limited to 2.78 pounds per hour based on the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10 P^{0.67}$ where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

Compliance Determination Requirements

D.1.3 Testing Requirements [326 IAC 2-1.1-11]

The Permittee is not required to test this emissions unit by this permit. However, IDEM may require compliance testing when necessary to determine if the emissions unit is in compliance. If testing is required by IDEM, compliance with the VOC limit specified in Condition D.1.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.1.4 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

Compliance Monitoring Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

There are no Compliance Monitoring Requirements for this source.

Record Keeping and Reporting Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.1.5 Record Keeping Requirements

(a) To document compliance with Conditions D.1.1, the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken daily and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.1.

(1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(2) A log of the dates of use;

(3) The volume weighted VOC content of the coatings used for each day;

(b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION

MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION

This form should be used to comply with the notification requirements under 326 IAC 2-6.1-5(a)(5).

Company Name:	**Steve Reiff, Inc.**
Address:	**5650 W. 800 S. South Whitley, IN 46787**
City:	**South Whitley, IN**
Phone #:	**219-723-4360**
MSOP #:	**183-11150-00031**

I hereby certify that **Steve Reiff, Inc.** is
- **9** still in operation.
- **9** no longer in operation.

I hereby certify that **Steve Reiff, Inc**. is
- **9** in compliance with the requirements of MSOP **183-11150-00031**.
- **9** not in compliance with the requirements of MSOP **183-11150-00031**.

Authorized Individual (typed):
Title:
Signature:
Date:

If there are any conditions or requirements for which the source is not in compliance, provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be achieved.

Noncompliance:

MALFUNCTION REPORT

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
FAX NUMBER - 317 233-5967

This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.

THIS FACILITY MEETS THE APPLICABILITY REQUIREMENTS BECAUSE IT HAS POTENTIAL TO EMIT 25 TONS/YEAR PARTICULATE MATTER ?_____, 25 TONS/YEAR SULFUR DIOXIDE ?_____, 25 TONS/YEAR NITROGEN OXIDES?_____, 25 TONS/YEAR VOC ?_____, 25 TONS/YEAR HYDROGEN SULFIDE ?_____, 25 TONS/YEAR TOTAL REDUCED SULFUR ?_____, 25 TONS/YEAR REDUCED SULFUR COMPOUNDS ?_____, 25 TONS/YEAR FLUORIDES ?_____, 100TONS/YEAR CARBON MONOXIDE ?_____, 10 TONS/YEAR ANY SINGLE HAZARDOUS AIR POLLUTANT ?_____, 25 TONS/YEAR ANY COMBINATION HAZARDOUS AIR POLLUTANT ?_____, 1 TON/YEAR LEAD OR LEAD COMPOUNDS MEASURED AS ELEMENTAL LEAD ?_____, OR IS A SOURCE LISTED UNDER 326 IAC 2-5.1-3(2) ?_____. EMISSIONS FROM MALFUNCTIONING CONTROL EQUIPMENT OR PROCESS EQUIPMENT CAUSED EMISSIONS IN EXCESS OF APPLICABLE LIMITATION _____.

THIS MALFUNCTION RESULTED IN A VIOLATION OF: 326 IAC _____ OR, PERMIT CONDITION # _____ AND/OR PERMIT LIMIT OF _____

THIS INCIDENT MEETS THE DEFINITION OF 'MALFUNCTION' AS LISTED ON REVERSE SIDE ? Y N

THIS MALFUNCTION IS OR WILL BE LONGER THAN THE ONE (1) HOUR REPORTING REQUIREMENT ? Y N

COMPANY: Steve Reiff, Inc. PHONE NO. (219) 723-4360
LOCATION: (CITY AND COUNTY) South Whitley, Whitley
PERMIT NO. MSOP 183-11150-00031 AFS PLANT ID: 00031 AFS POINT ID: _____ INSP: Ryan Hillman
CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON:_____

DATE/TIME MALFUNCTION STARTED: _____/_____/ 19____ _____ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION:_____

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE_____/_____/ 19____ _____ AM/PM

TYPE OF POLLUTANTS EMITTED: TSP, PM-10, SO2, VOC, OTHER:_____

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

MEASURES TAKEN TO MINIMIZE EMISSIONS:_____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES:_____
CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS:_____
CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT:_____
INTERIM CONTROL MEASURES: (IF APPLICABLE)_____

MALFUNCTION REPORTED BY:_____TITLE:_____
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY:_____DATE:_____TIME:_____

*SEE PAGE 2

Please note - This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.

326 IAC 1-6-1 Applicability of rule

Sec. 1. This rule applies to the owner or operator of any facility required to obtain a permit under 326 IAC 2-5.1 or 326 IAC 2-6.1.

326 IAC 1-2-39 "Malfunction" definition

Sec. 39. Any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner.

***Essential services** are interpreted to mean those operations, such as, the providing of electricity by power plants. Continued operation solely for the economic benefit of the owner or operator shall not be sufficient reason why a facility cannot be shutdown during a control equipment shutdown.

If this item is checked on the front, please explain rationale:

_____

_____

Indiana Department of Environmental Management
Office of Air Management

Addendum to the
Technical Support Document for a Minor Source Operating Permit

Source Name:	Steve Reiff, Inc.
Source Location:	5650 W. 800 S. South Whitley, IN 46787
County:	Whitley
Operation Permit No.:	183-11150-00031
SIC Code:	7532
Permit Reviewer:	Phillip Ritz/EVP

On October 30, 1999, the Office of Air Management (OAM) had a notice published in the Post & Mail, Columbia City, Indiana, stating that Steve Reiff, Inc., had applied for a Minor Source Operating Permit to construct and operate a surface coating operation for primary grain carts and finishing front loading cement mixers. The notice also stated that OAM proposed to issue a permit for this installation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On November 11, 1999, Mark G. Sanders of Barnes Consulting Services, LLC submitted comments on behalf of Steve Reiff, Inc. on the proposed Minor Source Operating Permit. The summary of the comments and corresponding responses is as follows:

Comment 1
Steve Reiff, Inc. is being asked by their primary customer to add one additional paint booth for cement mixers in existing Plant #1 - This will be accomplished by moving the existing Booth 1-2 to another location in Plant #1 and adding the new Booth 1-5 which will be identical to Booth 1-1. Material usage and production scheduling of Booth 1-5 will be identical to that of Booths 3-1 through 3-4.

Response 1
The booth is subject to 326 IAC 8-2-9 as it is a metal surface coating operation. The booth has a potential to emit which will not affect the permitting level of this source, and the source remains a minor source as VOC, any single HAP, and total HAPs emissions are less than 100, 10, and 25 tons per year, respectively.
Condition A.2 “Emission Units and Pollution Control Equipment Summary” has been changed to be as follows:

(a) Four (4) grain cart surface coating booths, identified as 1-1, 1-2, 1-3, 1-4, each with a maximum capacity of 0.5 grain carts per hour, using dry filters as particulate control, and exhausting to stacks PB1-1, PB1-2, PB1-3, PB1-4, respectively,

(b) One (1) cement mixer coating booth, identified as 1-5, with a maximum capacity of 0.056 cement mixers per hour, using dry filters as particulate control, and exhausting to stack PB1-5,

~~(b)~~**(c)** Four (4) front discharge mixer truck surface coating booths, identified as 3-1, 3-2, 3-3, 3-4, each with a maximum capacity of 0.056 grain carts per hour, using dry filters as particulate control, and exhausting to stacks PR-3-1, PR-3-2, PR-3-3, PR-3-4, respectively,

~~(c)~~**(d)** Three (3) sand blasters, identified as BB-1 and SB-1-2, with a maximum capacity of 1,119 pounds of abrasive per hour, exhausting inside the building, and

~~(d)~~**(e)** Nine (9) radiant space heaters, each rated at 0.975 million British thermal units (MMBtu) per hour, exhausting to the interior of the building.

Section D.1 "Emissions Unit Operation Conditions" has been changed to be as follows:

Emissions Unit Description

(a) Four (4) grain cart surface coating booths, identified as 1-1, 1-2, 1-3, 1-4, each with a maximum capacity of 0.5 grain carts per hour, using dry filters as particulate control, and exhausting to stacks PB1-1, PB1-2, PB1-3, PB1-4, respectively,

(b) One (1) cement mixer coating booth, identified as 1-5, with a maximum capacity of 0.056 cement mixers per hour, using dry filters as particulate control, and exhausting to stack PB1-5,

~~(b)~~**(c)** Four (4) front discharge mixer truck surface coating booths, identified as 3-1, 3-2, 3-3, 3-4, each with a maximum capacity of 0.056 grain carts per hour, using dry filters as particulate control, and exhausting to stacks PR-3-1, PR-3-2, PR-3-3, PR-3-4, respectively,

~~(c)~~**(d)** Three (3) sand blasters, identified as BB-1 and SB-1-2, with a maximum capacity of 1,119 pounds of abrasive per hour, exhausting inside the building, and

~~(d)~~**(e)** Nine (9) radiant space heaters, each rated at 0.975 million British thermal units (MMBtu) per hour, exhausting to the interior of the building.

(The information describing the process contained in this emissions unit description box is descriptive information and does not constitute enforceable conditions.)

Condition D.1.1 "Volatile Organic Compounds (VOC) [326 IAC 8-2-9]" has been changed to be as follows:

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volume-weighted average volatile organic compound (VOC) content of coating delivered to the applicator at the spray booths (ID's 1-1,1-2, 1-3, 1-4**, 1-5**, 3-1, 3-2, 3-3, and 3-4) shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for forced warm air dried coatings. The volume-weighted average VOC content shall be determined by use of the equation:

Condition D.1.2 "Particulate Matter (PM) [326 IAC 6-3-2(c)]" has been changed to be as follows:

(a) The particulate matter (PM) from the spray booths (ID's 1-1,1-2, 1-3, 1-4**, 1-5**, 3-1, 3-2, 3-3, and 3-4) shall be limited by the following:

The following revisions have been made to the Technical Support Document under Compliance Requirements (**bolded** language has been added, the language with a ~~line~~ through it has been deleted). The OAM prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision.

Page 1 of 6 of the TSD, Unpermitted Emission Units and Pollution Control Equipment, has been changed to be as follows:

The source also consists of the following unpermitted facilities/units:

(a) Four (4) grain cart surface coating booths, identified as 1-1, 1-2, 1-3, 1-4, each with a maximum capacity of 0.5 grain carts per hour, using dry filters as particulate control, and exhausting to stacks PB1-1, PB1-2, PB1-3, PB1-4, respectively,

(b) One (1) cement mixer coating booth, identified as 1-5, with a maximum capacity of 0.056 cement mixers per hour, using dry filters as particulate control, and exhausting to stack PB1-5,

~~(b)~~**(c)** Four (4) front discharge mixer truck surface coating booths, identified as 3-1, 3-2, 3-3, 3-4, each with a maximum capacity of 0.056 grain carts per hour, using dry filters as particulate control, and exhausting to stacks PR-3-1, PR-3-2, PR-3-3, PR-3-4, respectively,

~~(c)~~**(d)** Three (3) sand blasters, identified as BB-1 and SB-1-2, with a maximum capacity of 1,119 pounds of abrasive per hour, exhausting inside the building, and

~~(d)~~**(e)** Nine (9) radiant space heaters, each rated at 0.975 million British thermal units (MMBtu) per hour, exhausting to the interior of the building.

Page 2 of 6 of the TSD, Stack Summary, has been changed to be as follows:

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (^{0}F)
PB1-1	paint booth	28	4.00	28,800	ambient
PB1-2	paint booth	28	2.83	30,000	ambient
PB1-3	paint booth	31	2.83	15,000	ambient
PB1-4	paint booth	29	2.83	15,000	ambient
PB1-5	**paint booth**	**28**	**4.00**	**28,800**	**ambient**
PR3-1	paint booth	23	2.83	16,830	ambient
PR3-2	paint booth	23	2.83	16,830	ambient
PR3-3	paint booth	23	2.83	16,830	ambient
PR3-4	paint booth	23	2.83	16,830	ambient

Pages 2 and 3 of 6 of the TSD, Stack Summary, has been changed to be as follows:

Pollutant	Potential To Emit (tons/year)
PM	~~26.85~~ **30.11**
PM-10	~~23.83~~ **27.09**
SO_2	0.02
VOC	~~40.62~~ **49.57**
CO	3.23
NO_x	3.84

HAP's	Potential To Emit (tons/year)
Ethyl Benzene	~~0.85~~ **0.21**
Hexmethylene 1,6 Diisocyanate	~~0.09~~ **0.02**
MEK	~~7.96~~ **1.99**
MIK	3.68
Toluene	0.92
Xylene	~~3.53~~ **0.66**
TOTAL	~~17.02~~ **19.90**

Page 3 of 6 of the TSD, Source Status, has been changed to be as follows:

Pollutant	Emissions (ton/yr)
PM	~~10.74~~ **10.81**
PM10	~~7.72~~ **7.79**
SO_2	0.02
VOC	~~40.62~~ **49.57**
CO	3.23
NO_x	3.84
Single HAP	(MEK) ~~7.96~~ **9.95**
Combination HAPs	~~17.02~~ **19.90**

Indiana Department of Environmental Management
Office of Air Management

Technical Support Document (TSD) for a Minor Source Operating Permit

Source Background and Description

Source Name: **Steve Reiff, Inc.**
Source Location: **5650 W. 800 S. South Whitley, IN 46787**
County: **Whitley**
SIC Code: **7532**
Operation Permit No.: **183-11150-00031**
Permit Reviewer: **Phillip Ritz/EVP**

The Office of Air Management (OAM) has reviewed an application from Steve Reiff, Inc. relating to the construction and operation of a surface coating operation for primary grain carts and finishing front loading cement mixers.

Permitted Emission Units and Pollution Control Equipment

The source does not consist of any Permitted Emission Units and Pollution Control Equipment at this time.

Unpermitted Emission Units and Pollution Control Equipment

The source also consists of the following unpermitted facilities/units:

(a) Four (4) grain cart surface coating booths, identified as 1-1, 1-2, 1-3, 1-4, each with a maximum capacity of 0.5 grain carts per hour, using dry filters as particulate control, and exhausting to stacks PB1-1, PB1-2, PB1-3, PB1-4, respectively,

(b) Four (4) front discharge mixer truck surface coating booths, identified as 3-1, 3-2, 3-3, 3-4, each with a maximum capacity of 0.056 grain carts per hour, using dry filters as particulate control, and exhausting to stacks PR-3-1, PR-3-2, PR-3-3, PR-3-4, respectively,

(c) Three (3) sand blasters, identified as BB-1 and SB-1-2, with a maximum capacity of 1,119 pounds of abrasive per hour, exhausting inside the building, and

(d) Nine (9) radiant space heaters, each rated at 0.975 million British thermal units (MMBtu) per hour, exhausting to the interior of the building.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (^{0}F)
PB1-1	paint booth	28	4.00	28,800	ambient
PB1-2	paint booth	28	2.83	30,000	ambient
PB1-3	paint booth	31	2.83	15,000	ambient
PB1-4	paint booth	29	2.83	15,000	ambient
PR3-1	paint booth	23	2.83	16,830	ambient
PR3-2	paint booth	23	2.83	16,830	ambient
PR3-3	paint booth	23	2.83	16,830	ambient
PR3-4	paint booth	23	2.83	16,830	ambient

Enforcement Issue

(a) IDEM is aware that equipment has been constructed and operated prior to receipt of the proper permit. The subject equipment is listed in this Technical Support Document under the condition entitled *Unpermitted Emission Units and Pollution Control Equipment.*

(b) IDEM is reviewing this matter and will take appropriate action. This proposed permit is intended to satisfy the requirements of the construction permit rules.

Recommendation

The staff recommends to the Commissioner that the construction and operation be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on July 14, 1999, with additional information received on September 16, 1999.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (Appendix A, pages 1 through 6.)

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source or emissions unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA, the department, or the appropriate local air pollution control agency.”

Pollutant	Potential To Emit (tons/year)
PM	26.85
PM-10	23.83
SO_2	0.02
VOC	40.62
CO	3.23
NO_x	3.84

HAP's	Potential To Emit (tons/year)
Ethyl Benzene	0.85
Hexmethylene 1,6 Diisocyanate	0.09
MEK	7.96
MIK	3.68
Toluene	0.92
Xylene	3.53
TOTAL	17.02

(a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of PM and VOC are equal to or greater than 25 tons per year. Therefore, pursuant to 326 IAC 2-1, Sections 1 and 3, a construction permit is required.

Actual Emissions

No previous emission data has been received from the source.

County Attainment Status

The source is located in Whitley County.

Pollutant	Status
PM-10	attainment
SO_2	attainment
NO_2	attainment
Ozone	attainment
CO	attainment
Lead	attainment

(a) Volatile organic compounds (VOC) and oxides of nitrogen (NOx) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Whitley County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

(b) Whitley County has been classified as attainment or unclassifiable for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

Source Status

New Source PSD Definition (emissions after controls, based on 8,760 hours of operation per year at rated capacity and/ or as otherwise limited):

Pollutant	Emissions (ton/yr)
PM	10.74
PM10	7.72
SO_2	0.02
VOC	40.62
CO	3.23
NO_x	3.84
Single HAP	(MEK) 7.96
Combination HAPs	17.02

(a) This new source is **not** a major stationary source because no attainment pollutant is emitted at a rate of 250 tons per year or greater and it is not in one of the 28 listed source categories. Therefore, pursuant to 326 IAC 2-2, and 40 CFR 52.21, the PSD requirements do not apply.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This new source is not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

(a) each criteria pollutant is less than 100 tons per year,
(b) a single hazardous air pollutant (HAP) is less than 10 tons per year, and
(c) any combination of HAPs is less than 25 tons/year.

This is the first air approval issued to this source.

Federal Rule Applicability

(a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source.

(b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this source.

State Rule Applicability - Entire Source

326 IAC 2-6 (Emission Reporting)

This source is located in Whitley County and the potential to emit VOC and NO_X is less than one hundred (100) tons per year. Therefore, 326 IAC 2-6 does not apply.

326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

State Rule Applicability - Individual Facilities

326 IAC 6-3-2 (Process Operations)

(a) The particulate matter (PM) from the spray booths (ID's 1-1,1-2, 1-3, 1-4, 3-1, 3-2, 3-3, and 3-4) shall be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

The dry filters shall be in operation at all times the spray booths (ID's 1-1,1-2, 1-3, 1-4, 3-1, 3-2, 3-3, and 3-4) are in operation, in order to comply with this limit.

(b) The particulate matter emissions from the three (3) sand blasters, (ID BB-1 and SB-1-2) shall be limited to 2.78 pounds per hour based on the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

$E = 4.10(0.56^{0.67}) = 2.78$ pounds per hour

According to the emission calculations, the three (3) sand blasters, (ID BB-1 and SB-1-2) have a potential to emit (PTE) PM of 2.29 pounds per hour, and the source is in compliance with the requirement. (See emission calculations, pages 6 of 6).

326 IAC 8-1-6 (New Facilities: General Reduction Requirements)

New facilities, which have potential emissions of 25 tons or more per year, located anywhere in the state, which are not otherwise regulated by other provisions of this article (326 IAC 8), shall reduce VOC emissions using best available control technology (BACT). The spray booths (ID's 1-1,1-2, 1-3, 1-4, 3-1, 3-2, 3-3, and 3-4) are subject to 326 IAC 8-2-9 (Miscellaneous Metal Coating), therefore, the requirements under 326 IAC 8-1-6 (New Facilities General Reduction Requirements), are not applicable.

326 IAC 8-2-9 (Miscellaneous Metal Coating)

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volume-weighted average volatile organic compound (VOC) content of coating delivered to the applicator at the spray booths (ID's 1-1,1-2, 1-3, 1-4, 3-1, 3-2, 3-3, and 3-4) shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for forced warm air dried coatings. The volume-weighted average VOC content shall be determined by use of the equation:

Volume-Weighted Average = 3(individual coating usage (gal/hr)* Ec) / 3(coating usage (gal/hr))

where: Ec = pounds of VOC per gallon of coating less water for each coating

Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

Based on the MSDS submitted by the source and calculations made, the spray booths (ID's 1-1,1-2, 1-3, 1-4, 3-1, 3-2, 3-3, and 3-4) are in compliance with this requirement.

Air Toxic Emissions

Indiana presently requests applicants to provide information on emissions of the 188 hazardous air pollutants (HAPs) set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) Construction Permit Application Form Y.

(a) This source will emit levels of air toxics less than those which constitute a major source according to Section 112 of the 1990 Clean Air Act Amendments.

(b) See attached calculations for detailed air toxic calculations. (Appendix A, page 3 of 6)

Conclusion

The construction and operation of this surface coating operation for primary grain carts and finishing front loading cement mixers shall be subject to the conditions of the attached proposed **Minor Source Operating Permit 183-11150-00031.**

Appendix A: Emission Calculations

Company Name: Steve Reiff, Inc.
Address City IN Zip: 5650 W. 800 S. South Whitley, IN 46787
CP: 183-11150-00031
Reviewer: PR/EVP
Date: July 14, 1999

Uncontrolled Potential Emissions (tons/year)

	Emissions Generating Activity				
Pollutant	Plant 1 Surface Coating	Plant 3 Surface Coating	Abrasive Blasting	Natural Gas Combustion	**TOTAL**
PM	3.45	13.06	10.05	0.29	26.85
PM10	3.45	13.06	7.03	0.29	23.83
SO2	0.00	0.00	0.00	0.02	0.02
NOx	0.00	0.00	0.00	3.84	3.84
VOC	4.60	35.81	0.00	0.21	40.62
CO	0.00	0.00	0.00	3.23	3.23
total HAPs	(MIK) 3.68	(MEK) 7.96	0.00	0.00	(MEK) 7.96
worst case single HAP	5.49	11.53	0.00	0.00	17.02

Total emissions based on rated capacity at 8,760 hours/year.

Controlled Potential Emissions (tons/year)

	Emissions Generating Activity				
Pollutant	Plant 1 Surface Coating	Plant 3 Surface Coating	Abrasive Blasting	Natural Gas Combustion	**TOTAL**
PM	0.14	0.26	10.05	0.29	10.74
PM10	0.14	0.26	7.03	0.29	7.72
SO2	0.00	0.00	0.00	0.02	0.02
NOx	0.00	0.00	0.00	3.84	3.84
VOC	4.60	35.81	0.00	0.21	40.62
CO	0.00	0.00	0.00	3.23	3.23
total HAPs	(MIK) 3.68	(MEK) 7.96	0.00	0.00	(MEK) 7.96
worst case single HAP	5.49	11.53	0.00	0.00	17.02

Total emissions based on rated capacity at 8,760 hours/year, after control.

Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations

Company Name: Steve Reiff, Inc.
Address City IN Zip: 5650 W. 800 S. South Whitley, IN 46787
CP: 183-11150-00031
Reviewer: PR/EVP
Date: July 14, 1999

Number of working days/week: 5
Number of working hours/day: 8

Material	Density (Lb/Gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/week)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Plant 1																	
PPG CRE-904 Primer	11.20	25.00%	0.0%	25.0%	0.0%	75.00%	0.75000	20.000	0.500	2.80	2.80	1.05	25.20	4.60	3.45	3.73	75%
CRE-91 Catalyst	8.18	21.57%	0.0%	21.6%	0.0%	78.43%	0.25000	20.000	0.500	1.76	1.76	0.22	5.29	0.97	0.88	2.25	75%
												1.05	25.20	4.60	3.45		

State Potential Emissions **Add worst case coating to all solvents**

Limit Usage: PM	Limit Usage: VOC	Control Efficiency: VOC	Control Efficiency: PM	Limit Usage: VOC lbs per Hour	Limit Usage: VOC lbs per Day	Limit Usage: VOC tons per Year	Controlled PM tons/yr
0.00%	0.00%	0.00%	96.00%	**1.05**	**25.20**	**4.60**	**0.14**

Material	Density (Lb/Gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/week)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Plant 3																	
3480S	7.98	47.62%	0.0%	47.6%	0.0%	45.12%	4.00000	9.330	0.233	3.80	3.80	3.55	85.09	15.53	4.27	8.42	75%
N2225HM	9.01	41.39%	0.0%	41.4%	0.0%	49.75%	9.40000	9.330	0.233	3.73	3.73	8.18	196.24	35.81	12.68	7.50	75%
Imron193S	9.01	25.62%	0.0%	25.6%	0.0%	69.92%	3.10000	9.330	0.233	2.31	2.31	1.67	40.06	7.31	5.31	3.30	75%
Imron389S	8.13	99.00%	0.0%	99.0%	0.0%	94.00%	0.19000	9.330	0.233	8.05	8.05	0.36	8.56	1.56	0.00	8.56	75%
P5-934	12.15	27.84%	0.0%	27.8%	0.0%	72.16%	5.83000	9.330	0.233	3.38	3.38	4.60	110.39	20.15	13.06	4.69	75%
A1-936	7.87	45.00%	0.0%	45.0%	0.0%	55.00%	1.17000	9.330	0.233	3.54	3.54	0.97	23.20	4.23	1.29	6.44	75%
												8.18	196.24	35.81	13.06		

State Potential Emissions **Add worst case coating to all solvents**

Limit Usage: PM	Limit Usage: VOC	Control Efficiency: VOC	Control Efficiency: PM	Limit Usage: VOC lbs per Hour	Limit Usage: VOC lbs per Day	Limit Usage: VOC tons per Year	Controlled PM tons/yr
0.00%	0.00%	0.00%	98.00%	**8.18**	**196.24**	**35.81**	**0.26**

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Total = Worst Coating + Sum of all solvents used
Max units per hour = (Max units/week)/ (days/working week)/(hours/working day)

HAP Emission Calculations

Company Name: Steve Reiff, Inc.
Address City IN Zip: 5650 W. 800 S. South Whitley, IN 46787
CP: 183-11150-00031
Reviewer: PR/EVP
Date: July 14, 1999

Number of working days/week: 5
Number of working hours/day: 8

Material	Density (Lb/Gal)	Gal of Mat (gal/unit)	Maximum (unit/week)	Maximum (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % MEK	Weight % MIK	Weight % Methanol	Weight % Styrene	Weight % Hexmethylene 1,6, diisocyanate	Weight % Glycol Ether	Weight % Ethyl Benzene
Plant 1													
PPG CRE-904 Primer	11.20	0.75000	20.000	0.500		5.00%		20.00%					
CRE-91 Catalyst	8.18	0.25000	20.000	0.500	20.00%								
Plant 3													
3480S	7.98	4.00000	9.330	0.233									
N2225HM	9.01	9.40000	9.330	0.233	1.00%							0.00%	
Imron193S	9.01	3.10000	9.330	0.233							0.30%		
Imron389S	8.13	0.19000	9.330	0.233									
P5-934	12.15	5.83000	9.330	0.233	2.00%		11.00%						
A1-936	7.87	1.17000	9.330	0.233	28.00%								9.00%

Material	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	MEK Emissions (ton/yr)	MIK Emissions (ton/yr)	Methanol Emissions (ton/yr)	Styrene Emissions (ton/yr)	Hexmethylene 1,6, diisocyanate Emissions (ton/yr)	Glycol Ether Emissions (ton/yr)	Ethyl Benzene Emissions (ton/yr)
PB1/PB2									
PPG CRE-904 Primer	0.00	0.92	0.00	3.68	0.00	0.00	0.00	0.00	0.00
CRE-91 Catalyst	0.90	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total State Potential Emissions	**0.90**	**0.92**	**0.00**	**3.68**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**
									5.49

Material	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	MEK Emissions (ton/yr)	MIK Emissions (ton/yr)	Methanol Emissions (ton/yr)	Styrene Emissions (ton/yr)	Hexmethylene 1,6, diisocyanate Emissions (ton/yr)	Glycol Ether Emissions (ton/yr)	Ethyl Benzene Emissions (ton/yr)
Plant 3									
3480S	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
N2225HM	0.87	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Imron193S	0.00	0.00	0.00	0.00	0.00	0.00	0.09	0.00	0.00
Imron389S	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
P5-934	1.45	0.00	7.96	0.00	0.00	0.00	0.00	0.00	0.00
A1-936	2.63	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.85
Total State Potential Emissions	**2.63**	**0.00**	**7.96**	**0.00**	**0.00**	**0.00**	**0.09**	**0.00**	**0.85**
									11.53

METHODOLOGY

HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs

Max units per hour = (Max units/week)/ (days/working week)/(hours/working day)

Appendix A: Emissions Calculations
Volume Weighted Average
From Miscellaneous Fugitive Adhesive Applications Operations

Company Name: Steve Reiff, Inc.
Address City IN Zip: 5650 W. 800 S. South Whitley, IN 46787
CP: 183-11150-00031
Reviewer: PR/EVP
Date: July 14, 1999

Compliance Calculations

	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Coating Usage (gal/hr)		VOC lb/gal of coating		lb VOC/hr
Plant 1							
PPG CRE-904 Primer	0.75000	0.500	0.375	x	2.80	=	1.0500
CRE-91 Catalyst	0.25000	0.500	0.125	x	1.76	=	0.2200
Total			**0.5000**				**1.2700**

Volume-Weighted Average **0.9750/4.9621 = 2.54 VOC lb/gal**

	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Coating Usage (gal/hr)		VOC lb/gal of coating		lb VOC/hr
Plant 3							
3480S	4.00000	0.233	0.933	x	3.80	=	3.5455
N2225HM	9.40000	0.233	2.193	x	3.73	=	8.1765
Imron193S	3.10000	0.233	0.723	x	2.31	=	1.6691
Imron389S	0.19000	0.233	0.044	x	8.05	=	0.3567
P5-934	5.83000	0.233	1.358	x	3.38	=	4.5914
A1-936	1.17000	0.233	0.273	x	3.54	=	0.9661
Total			**5.5242**				**19.3053**

Volume-Weighted Average **1.7214/25.9431 = 3.49 VOC lb/gal**

Volume-Weighted Average = (individual coating usage (gal/hr)* Ec) / (coating usage (gal/hr))
where: Ec = pounds of VOC per gallon of coating less water for each coating

Appendix A: Emission Calculations
Natural Gas Combustion
MM Btu/hr 0.3 - < 100

Company Name: Steve Reiff, Inc.
Address City IN Zip: 5650 W. 800 S. South Whitley, IN 46787
CP: 183-11150-00031
Reviewer: PR/EVP
Date: July 14, 1999

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
8.8	76.9

Heat Input Capacity includes:
nine (9) radiant space heaters, each rated at 0.975 mmBtu per hour

	Pollutant					
	PM	PM10	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	7.6	7.6	0.6	100.0	5.5	84.0
Potential Emission in tons/yr	0.29	0.29	0.02	3.84	0.21	3.23

Methodology:
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas
Emission Factors for NOx: uncontrolled = 100, Low Nox Burner = 50, Flue gas recirculation = 32
All PM is assumed to be less than 1.0 micrometer in diameter. Therefore, the PM emission factors may be used to estimate PM10, PM2.5, and PM1 emissions.
Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
Emission Factors from AP 42, Chapter 1.4, Tables 1.4-1 and 1.4-2, SCC #1-01-006-02, #1-02-006-02, #1-03-006-02, #1-03-006-03
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Appendix A: Emission Calculations
Abrasive Blasting

Company Name: Steve Reiff, Inc.
Address City IN Zip: 5650 W. 800 S. South Whitley, IN 46787
CP: 183-11150-00031
Reviewer: PR/EVP
Date: July 14, 1999

Table 1 - Emission Factors for Abrasives

	Emission Factor	
Abrasive	lb PM / lb abrasive	lb PM10 / lb PM
Sand	0.041	0.70
Grit	0.010	0.70
Steel Shot	0.004	0.86
Other	0.010	

Table 2 - Density of Abrasives (lb/ft3)

Abrasive	Density (lb/ft3)
Al oxides	160
Sand	99
Steel	487

Table 3 - Sand Flow Rate (FR1) Through Nozzle (lb/hr)

Flow rate of Sand Through a Blasting Nozzle as a Function of Nozzle pressure and Internal Diameter

	Nozzle Pressure (psig)							
Internal diameter, in	30	40	50	60	70	80	90	100
1/8	28	35	42	49	55	63	70	77
3/16	65	80	94	107	122	135	149	165
1/4	109	138	168	195	221	255	280	309
5/16	205	247	292	354	377	420	462	507
3/8	285	355	417	477	540	600	657	720
7/16	385	472	560	645	755	820	905	940
1/2	503	615	725	835	945	1050	1160	1265
5/8	820	990	1170	1336	1510	1680	1850	2030
3/4	1140	1420	1670	1915	2160	2400	2630	2880
1	2030	2460	2900	3340	3780	4200	4640	5060

Adjusting Flow Rates for Different Abrasives and Nozzle Diameters

Flow Rate (FR) = Abrasive flow rate (lb/hr) with internal nozzle diameter (ID)		
FR1 = Sand flow rate (lb/hr) with internal nozzle diameter (ID1) From Table 3 =	657	462
D = Density of abrasive (lb/ft3) From Table 2 =	99	99
D1 = Density of sand (lb/ft3) =	99	99
ID = Actual nozzle internal diameter (in) =	0.375	0.3125
ID1 = Nozzle internal diameter (in) from Table 3 =	0.375	0.3125

Flow Rate (FR) (lb/hr) = **657.000** **462.000** per nozzle

Uncontrolled Emissions (E, lb/hr)

EF = emission factor (lb PM/ lb abrasive) From Table 1 =	0.041	0.041
FR = Flow Rate (lb/hr) =	657.000	462.000
w = fraction of time of wet blasting =	0	0 %
N = number of nozzles =	1	1
Enclosure for PM reduction=	95.00%	95.00%

Unenclosed Emissions =	**1.35**	**0.95 lb/hr**
	5.90	**4.15 ton/yr**

Enclosed Emissions =	**2.29 PM lb/hr**
	1.61 PM-10 lb/hr
	10.05 PM ton/yr
	7.03 PM-10 ton/yr

METHODOLOGY

Emission Factors from Stappa Alapco, Section 3 "Abrasive Blasting"
Ton/yr = lb/hr X 8760 hr/yr X ton/2000 lbs
Flow Rate (FR) (lb/hr) = FR1 x (ID/ID1)2 x (D/D1)
E = EF x FR x (1-w/200) x N
w should be entered in as a whole number (if w is 50%, enter 50)